

# **EXHIBIT D**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

-----) MDL No. 2804  
IN RE: NATIONAL PRESCRIPTION )  
OPIATE LITIGATION )  
----- ) Case No. 17-md-2804  
THIS DOCUMENT RELATES TO: )  
ALL CASES )  
-----) Hon. Dan A. Polster

HIGHLY CONFIDENTIAL  
SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

VIDEOTAPED DEPOSITION OF  
DEBORAH BISH

February 1, 2019

Toledo, Ohio

1 MR. GADDY: Objection to form.

2 BY THE WITNESS:

3 A. Not if they had the large quantities in  
4 there that alerted us, they would have always been  
5 checked.

6 BY MS. SWIFT:

7 Q. Do you have any personal knowledge of  
8 Walgreens ever shipping controlled substances into any  
9 illegitimate channels?

10 MR. GADDY: Objection to form.

11 BY THE WITNESS:

12 A. No.

13 BY MS. SWIFT:

14 Q. Do you have any personal knowledge of  
15 Walgreens ever shipping controlled substances to a  
16 Walgreens store that then diverted those controlled  
17 substances into an illegitimate channel?

18 A. No.

19 Q. Did you personally take steps in your job  
20 to make sure that Walgreens did not ship unusually  
21 large quantities of controlled substances to Walgreens  
22 stores?

23 MR. GADDY: Objection to form, leading.

24 BY THE WITNESS:

1           A.       In addition to calling the store or you  
2   are saying -- is that the point you are try -- asking?

3   BY MS. SWIFT:

4           Q.       Let me see if I can ask it in a more  
5   open-ended way.

6           A.       Sorry.

7           Q.       We've talked about a number of steps in  
8   the ordering process where unusually large orders may  
9   have been brought to your attention.

10          A.       Right.

11          Q.       In that process did you take steps to make  
12   sure that Walgreens wasn't shipping unusually large  
13   quantities of controlled substances to the stores?

14          MR. GADDY:  Objection to -- objection to form,  
15   leading.

16   BY THE WITNESS:

17          A.       Yes, I would call the store and usually  
18   mark the order down because they didn't really want  
19   what they ordered, if it was an unusually large  
20   amount.

21   BY MS. SWIFT:

22          Q.       If you would, please, pull out of your  
23   stack of exhibits Exhibit 14.

24          A.       Okay.

1           Q.     Exhibit 14 is the memorandum from  
2     Mr. Todd -- I'm sorry -- it is from Justin Joseph to  
3     Todd Polarolo dated May 27th, 2006, with the "re"  
4     line: "DEA audit preliminary response March 6th,  
5     2006."

6                     Correct?

7           A.     Yes.

8           Q.     Do you remember getting questions about  
9     this memorandum earlier today?

10          A.     Yes.

11          Q.     I believe you testified you had never seen  
12     it before, correct?

13          A.     Correct.

14          Q.     Okay. I just have a couple of questions  
15     about it.

16                     Just to refresh your memory a little bit,  
17     counsel asked you questions about the third paragraph  
18     in the memo regarding the regulation with  
19     No. 1301.74(b).

20                     Do you see that?

21          A.     Yes.

22          Q.     Do you remember those questions?

23          A.     I don't remember the questions, no.

24          Q.     Do you remember the questions about the